# IN THE UNITED STATES DISTRICT COURT
## FOR THE EASTERN DISTRICT OF TEXAS
### SHERMAN DIVISION

| | |
|---|---|
| **AKOLOUTHEO, LLC,**<br><br>　**Plaintiff,**<br><br>　**v.**<br><br>**1)  SIEMENS CORP.; and**<br><br>**2)  SIEMENS PRODUCT LIFECYCLE MANAGEMENT SOFTWARE INC. (d.b.a. UGS SOFTWARE AND SERVICES CORP.),**<br><br>　**Defendants.** | **CIVIL ACTION NO.: 4:18-cv-552**<br><br>**JURY TRIAL DEMANDED** |

## MOTION FOR DISMISSAL

The plaintiff Akoloutheo, LLC ("Akoloutheo" or "Plaintiff") – pursuant to Fed. R. Civ. P. 41(a)(1)(A)(i) – hereby moves for an order dismissing all claims against all defendants in this action WITH PREJUDICE. The defendants have not answered or moved for summary judgment. Each party shall bear its own costs, expenses and attorney's fees.

September 21, 2018

　　　　　　　　　　　　　　　　Respectfully Submitted,

　　　　　　　　　　　　　　　By: /s/ *Ronald W. Burns*

　　　　　　　　　　　　　　　　Ronald W. Burns
　　　　　　　　　　　　　　　　Texas State Bar No. 24031903
　　　　　　　　　　　　　　　　RWBurns & Co., PLLC
　　　　　　　　　　　　　　　　5999 Custer Road, Suite 110-507
　　　　　　　　　　　　　　　　Frisco, Texas 75035
　　　　　　　　　　　　　　　　972-632-9009
　　　　　　　　　　　　　　　　rburns@burnsiplaw.com

[2]

Kenneth Thomas Emanuelson (*Lead Counsel*)
Texas Bar No. 24012591
The Emanuelson Firm
17304 Preston Road, Suite 800
Dallas, Texas 75252
469-363-5808
ken@emanuelson.us

**ATTORNEYS FOR PLAINTIFF
AKOLOUTHEO, LLC**

## CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5.  As such, the foregoing was served on all counsel of record who have consented to electronic service.  Local Rule CV-5.  Pursuant to Fed. R. Civ. P. 5 and Local Rule CV-5, all others not deemed to have consented to electronic service will be served with a true and correct copy of the foregoing by email, on this the 21st day of September, 2018.

/s/ *Ronald W. Burns*

Ronald W. Burns